

20 January 2020

Dear Sirs,

Thank you for the opportunity to respond to the Commission's proposals for new warding arrangements for the City of Westminster. New West End Company is the Business Improvement District for London's West End International Centre. We represent over 600 retail, hospitality and property businesses in and around Oxford Street, Regent Street, Bond Street and East Mayfair.

Our key recommendations

We would like to recommend the following two changes which would have a significant positive impact on the West End International Centre with minimal impact on voter numbers in each ward:

Recommendation 1

"In order to preserve community identity and to support effective and convenient local government that element of Marylebone currently proposed to be included in a new Hyde Park Ward, should instead continue to be united in one ward with the rest of Marylebone and the eastern boundary of the Hyde Park ward should be defined by the more obvious and defensible Edgware Road".

Recommendation 2

"In order to protect the integrity of the formally designated West End International Centre the part of the southern boundary of the proposed Hyde Park Ward that runs along north west Oxford Street, should be redrawn one block further north, along the south side of Wigmore Street. Since there are very few residents living within the affected area, mainly commercial blocks, this change should not impact greatly on the number of voters in each ward".

Why West End businesses have an interest in the review

We appreciate that the key objective of the Commissioner's review is to ensure that the number of voters represented by each councillor are approximately the same. But the Commission also has the remit to reflect the identity and interests of communities and to promote effective and convenient local government.

Ward boundaries have a significant impact on the relationships and operations between businesses and individual councillors and also between businesses and the Council as a whole. For the West End International Centre these relationships are extremely important and have a large impact on the district's continuing vitality.

The West End businesses' good working relationships with Westminster City Council and our local councillors are vital in maintaining and enhancing the West End International Centre against constant and increasing threats from global competitors. Local issues such as planning, licencing, the local environment, street services, events and public realm all play a key role in the continuous development of the West End which benefits businesses, residents and the wider UK economy.

In light of the importance of the structure of the local authority to the future good growth of the West End International Centre, we wish to comment on how the Commission's proposals are likely to impact on West End businesses and explain our recommendations which we believe recognises and reflects the Commission's key objectives, but in a way that both maximise benefits to the West End International Centre and minimise any unintentional negative consequences.

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The national importance of the West End International Centre to the UK economy and why we ask the Commission take account of business views in its review of Westminster ward boundaries.

The West End is a major UK national asset and it is important that any changes in the local political environment and policies take account of their impact (intentional or unintentional) on its performance.

The West End is the largest of just two International Centres in the Mayor's London Plan. The West End International Centre draws over 200 million visits annually. It is a major attraction for national and international visitors, businesses and investors to London and the wider UK. The West End produces over £51bn GVA annually for the UK economy, more than the £43bn created by The City and as much as the total GVA of Wales. West End retailers alone, generate more than £9bn in sales each year and employ over 150,000 people, many of whom are Westminster residents and voters.

As well as a national economic asset, a thriving West End is an amazing, world class, local environment for thousands of Westminster residents and voters living in and round its streets.

It is for this reason that we ask the Commission to take into serious consideration how any proposals for new ward boundaries can meet the Commission's key objective of voter equalisation, without inadvertently damaging the operations of this vital national asset but instead, if possible, actually helping to enhance its performance.

Recommendation 1 - West End wards for West End communities

The Commission's proposals to include an element of the historic district Marylebone in an unnatural and isolated eastern peninsular of the proposed Hyde Park Ward, does not respect the natural communities of these two areas, the local amenity societies and Neighbourhood Forums and fails to appreciate the importance of the West End International Centre.

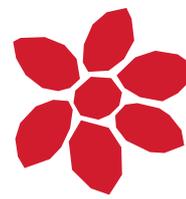
The Edgware Road is well recognised as a clear and meaningful boundary for both the local residents and business communities.

In contrast, the proposed new Hyde Park Ward will result in a vital part of the West End - a part which includes the internationally iconic Selfridges department store – being separated electorally from the rest of the West End. This has significant drawbacks for the West End International Centre.

In particular, it is strikingly clear that the eastern element of the proposed new Hyde Park Ward, east of the Edgware Road, has little in common with the much larger element west of the Edgware Road, which has a far weaker relationship with the West End International Centre and its very particular issues. They are very clearly two very different districts. Electorally this eastern annex is much smaller than the larger western element which means that local councillors are more likely to give greater prominence to the views of the majority residents in the west, than to the interests of international businesses in the east.

While representing the particular views of West End businesses, we can also clearly see that the Commission's proposal for new wards in this area do not reflect the interest and identity of the local Marylebone resident population which will be artificially split in two.

We strongly recommend that the Commission should seek a new solution that does not link in one ward the area east of the Edgware Road, with the area to the west. We know that Selfridges, the Portman Estate and the Marylebone Association have all made similar recommendations and have suggested ways in which this could be achieved. New West End Company fully supports both the principles of their objections and any solution that would recognise their concerns while meeting the objective of equal voter numbers in each ward.



We hope that this strong alignment of views of the resident and business community in opposition to this particular proposal, will persuade the Commission to re-examine it seriously to find a more acceptable solution. We believe that the issues raised above, outweigh the requirement for equal voter numbers and that applying the maximum latitude in numbers will, in this case, provide the best outcome in terms of governance.

Recommendation 2 - The “West End International Centre in one ward” solution

Whatever the Commission should decide about the boundaries of the proposed Hyde Park Ward, we believe that all of the International Centre should, in addition, fall within just one ward.

Currently the West End International Centre lies within three wards resulting in our district being represented by nine councillors. While we appreciate that the proposed two ward option is an improvement on the current situation, we are concerned that the current proposals see much of the north western section of Oxford Street (north Oxford Street from James Street to Marble Arch) located in a separate ward from the rest of the International Centre.

We believe that the Commission should take this opportunity to go one step further and find a way to ensure that the whole of the International Centre, including this north western section, which is small in size but big in impact, could be incorporated into a new West End Ward, while still retaining equal voter numbers in each ward.

We believe that there are great benefits in concentrating the West End in a single ward.

By concentrating the interests of immediate West End residents and the unique requirements of the West End International Centre, it would produce a ward that reflects an obviously natural community, is less complicated to operate in for businesses and residents, is more effective in decision making and easier to understand. It would result in a smaller group of councillors who can focus on the West End and the interests of those voters most closely integrated into it.

If the West End International Centre should be artificially split into two wards, this would result in a doubling of the geographical political area in which the International Centre operates, which will dilute the relative importance of the West End within these wards. It doubles the number of councillors that the West End would have to work with, while diverting their full attention from the International Centre by including voters more distant and with different issues of importance. This makes local political decision-making more complicated and far less certain.

These weaknesses have been our experience under the current wards, where we have to work with nine local councillors in wards that stretch into areas away from the core West End.

The very compact geographic spread of the International Centre makes it perfectly achievable to create one ward for the West End International Centre. Indeed, the current proposals will already result in over 80% of the West End International Centre being in the newly formed West End ward.

Importantly we believe that this “West End International Centre in one ward” could be achieved with little if any impact on voter numbers in each ward, by simply redrawing the boundary of the proposed Hyde Park Ward (or preferably a more appropriate new ward for the full Marylebone area), where it encompasses that part of the International Centre so that it runs one block further north, along Wigmore Street.

The strip that would be moved from the proposed Hyde Park Ward (or new Marylebone based ward) comprises predominantly of commercial buildings with no significant number of residents, so that this minor change could easily be accommodated whatever ward is decided upon for that area of Marylebone.



Thank you

Thank you for considering our two recommendations. While we are aware that making changes to proposed ward boundaries at this stage may cause some administrative difficulties, we believe that the national importance of the International Centre merits serious consideration of these two changes to support the West End's future vitality for the benefit of local residents and the national economy.

We would be happy to discuss with you further any issues we have raised.

Yours faithfully,



Jace Tyrrell
CHIEF EXECUTIVE

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